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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC., <u>et al.</u> , ¹	:	Case No. 08-35653-KRH
	:	(Jointly Administered)
Debtors.	:	
	:	
	:	
	:	

**NOTICE OF MOTION FOR ORDER PURSUANT TO BANKRUPTCY CODE
SECTIONS 105 AND 363 APPROVING SALE OF CERTAIN PATENTS AND OTHER
INTELLECTUAL PROPERTY AND RELATED ASSETS AS BEING FREE AND
CLEAR OF ALL LIENS, CLAIMS AND INTERESTS AND (B) HEARING THEREON**

PLEASE TAKE NOTICE THAT the Circuit City Stores, Inc. Liquidating Trust has filed the following with the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”):

1. Liquidating Trust’s Motion for Order Pursuant to Bankruptcy Code Sections 105 and 363 Approving Sale of Certain Patents and Other Intellectual Property and Related Assets as Being Free and Clear of all Liens, Claims and Interests (the “Motion”).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their respective federal tax identifications numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSSstuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for Circuit City West Coast is 9250 Sheridan Boulevard, Westminster, Colorado 80031. For all other Debtors, the address is 9950 Mayland Drive, Richmond, Virginia 23233.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE THAT in connection with the Debtors' Chapter 11 Cases, a Supplemental Order Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. 6208] (the "Case Management Order") was entered by the Court on December 30, 2009, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained at no charge at www.kccllc.net/circuitcity or for a fee via PACER at <http://www.vaeb.uscourts.gov>

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before **August 15, 2011** you or your attorney must:

- ☒ File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order. You must mail or otherwise file it early enough so the Court will **receive** it on or before the due date identified herein.

Clerk of the Court
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

You must also serve your objection in accordance with the Case Management Order and on the undersigned.

PLEASE TAKE FURTHER NOTICE THAT on **August 22, 2011 at 2:00 p.m.**, (or such time thereafter as the matter may be heard) the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, of the United States Courthouse, 701 E. Broad Street Richmond, Virginia 23219, and will move the Court for entry of an order approving the Motion.

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue orders granting the requested relief without further notice or hearing.

Dated: July 21, 2011

/s/ Lynn L. Tavenner

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of July, 2011 a true copy of the foregoing Notice Of (A) Motion For Order Pursuant to Bankruptcy Code Sections 105 and 363 Approving Sale of Certain Patents and Other Intellectual Property and Related Assets as Being Free and Clear of all Liens, Claims and Interests And (B) Hearing Thereon, together with the referenced Motion, was served via electronic mail to all parties receiving service through the Court's ECF system and either electronically or by first-class mail, postage prepaid, to (i) all parties on the Core Group and the 2002 Service List as defined in the Case Management Order and updated and maintained on the KCC website, www.kcellc.net/circuitcity, (ii) all known creditors previously asserting security interests in the Intellectual Property, (iii) all known interested bidders, and (iv) the potential Purchaser, Imaging Transfer Co. LLC at 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

/s/ Lynn L. Tavenner

Co-Counsel